

United States Bankruptcy Court
District of New Jersey
Caption in Compliance with D.N.J. LBR 9004-1

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*Counsel for Certain Underwriters at Lloyd's,
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In re:

THE DIOCESE OF CAMDEN, NEW JERSEY,

Debtor.

Chapter 11

Case No. 20-21257 (JNP)

Related to Doc. 3982

**LONDON MARKET INSURERS' JOINDER TO CENTURY'S
MOTION TO EXTEND TIME TO FILE A RESPONSE**

Certain Underwriters at Lloyd's, London, Catalina Worthing Insurance Ltd f/k/a HFPI (as Part VII transferee of Excess Insurance Company Ltd. and London & Edinburgh Insurance Company Ltd.), RiverStone Insurance (UK) Ltd. (as successor in interest to Terra Nova Insurance Company Ltd), and Sompo Japan Nipponkoa Insurance Company of Europe Limited (f/k/a The Yasuda Fire & Marine Insurance Company of Europe Ltd.) (collectively, "London Market Insurers" or "LMI"), by and through their undersigned counsel, hereby joins in the relief requested by Century¹ in its *Motion to Extend Time to File a Response* [Dkt. No. 3982]. As set forth therein, Century seeks an extension until May 19, 2025, of the deadline to respond to the *Application in Support of Stipulation and Consent Order Between the Debtor and Tort Committee for Relief from the Automatic Stay* [Dkt. No. 3978] (the "Application") filed by the above-captioned "Debtor" and the Official Committee of Tort Claimant Creditors (collectively, the "Plan Proponents"). LMI respectfully submits that this modest extension is appropriate and should be granted under the circumstances.

The Application - which the Plan Proponents filed on a Sunday (April 27) - seeks entry of a consent order² lifting the §362 automatic stay "to allow" the continuation of "no less than four and no more than eight personal injury law suits [*sic*] commenced against the Debtor."³ The Application does not contain any notice of motion or other indication of a response deadline but is instead accompanied by text on the docket stating that the "[o]bjection deadline is 5/5/2025,"⁴ approximately one week after the Plan Proponents filed the Application. That is roughly half of

¹ Century" means Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America, Federal Insurance Company, and Illinois Union Insurance Company.

² See Application, Ex. A (*Stipulation and Consent Order for Relief from the Automatic Stay*).

³ *Id.* at § I; see also Application at 3 ("[The Plan Proponents request,] through this Application, that the Court lift the automatic stay to allow between four and eight pending personal injury lawsuits [*sic*] ... to proceed in state court ... against the [Debtor] ...").

⁴ See Dkt. No. 3978.

the time typically afforded under the Federal Rules of Bankruptcy Procedure,⁵ and the Plan Proponents have not offered any justification for such an abbreviated schedule here. Accordingly, LMI joins with Interstate and Century and respectfully requests entry of an order extending until May 19, 2025, the deadline to respond to the Application.

Respectfully submitted,

Dated: May 5, 2025

By: /s/ Sommer L. Ross
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⁵ See FED. R. BANKR. P. 4001(d)(1)(A)(iii), (d)(2) (collectively providing a default timeframe of "within 14 days after the notice is mailed" for objections to "[a] motion to approve ... an agreement to modify or terminate the stay provided for in § 362").